

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARMEN MARIA NAVARRO FLORES

DEBTOR

CASE NO 15-08468-ESL

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

NOW COMES, CARMEN MARIA NAVARRO FLORES, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a proposed amended Plan, dated February 29, 2016, herewith and attached to this motion.
2. This proposed amended Plan is to correct the balance owed to secured creditor Rushmore Loan Management Services, as appears on claim 3-1, and to include step-up payment since maturity date of retirement loan falls on month 40 of Plan's payment period.

WHEREFORE, debtor respectfully requests the confirmation of the requested amended Plan, dated February 29, 2016.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal

Service copy of this motion to the following non CM/ECF participants: debtor, Carmen Maria Navarro Flores, and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of February, 2016.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726
TEL. NO. (787) 744-7699
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

NAVARRO FLORES, CARMEN MARIA

Debtor(s)

Case No. 3:15-bk-8468

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>2/29/2016</u> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE \$ <u>160.00</u> X <u>40</u> = \$ <u>6,400.00</u> \$ <u>220.00</u> X <u>20</u> = \$ <u>4,400.00</u> \$ _____ X _____ = \$ _____ \$ _____ X _____ = \$ _____ \$ _____ X _____ = \$ _____ TOTAL: \$ <u>10,800.00</u>		II. DISBURSEMENT SCHEDULE A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>Rushmore Loan Mgr</u> Cr. _____ Cr. _____ # <u>1028000000794</u> # _____ \$ <u>5,472.97</u> \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <u>AEELA</u> 5. <input type="checkbox"/> Other: 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Sistema De Retiro</u> <u>Rushmore Loan Mgr</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."	
Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: <input type="checkbox"/> Other: Periodic Payments to be made other than, and in addition to the above: \$ _____ X _____ = \$ _____ PROPOSED BASE: \$ <u>10,800.00</u>			
III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,868.00</u>			
Signed: <u>/s/ CARMEN MARIA NAVARRO FLORES</u> Debtor Joint Debtor			

Attorney for Debtor RFigueroa Carrasquillo Law Office PSC

Phone: (787) 744-7699

CHAPTER 13 PAYMENT PLAN

Label Matrix for local noticing

0104-3

Case 15-08468-ESL13

District of Puerto Rico

Old San Juan

Mon Feb 29 11:55:01 AST 2016

AEELA

PO Box 364508

San Juan, PR 00936-4508

Rushmore Loan Management Services as service

Fiddler Gonzalez & Rodriguez PSC

P.O. Box 363507

San Juan, PR 00936-3507

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

Apx Vivint

62992 Collections Center Dr.

Chicago, IL 60693-0629

At T Mobility

Po Box 981008

Boston, MA 02298-1008

Att Services

103 Ortegon St

Guaynabo, PR 00966-2505

BANCO POPULAR DE PR

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN, PR 00936-6818

Citibank South Dakota N.a.

2365 Northside Dri

San Diego, CA 92108-2709

Claro

Po Box 360998

San Juan, PR 00936-0998

Eos Cca

Po Box 981008

Boston, MA 02298-1008

Luis R. Rivera Santos, Esq.

Law Affairs, PSC

Ave. Pino H-23 Villa Turabo

Caguas, PR 00725-6146

Midland Credit Management, Inc. as agent for

Midland Funding LLC

PO Box 2011

Warren, MI 48090-2011

Midland Funding

2365 Northside Dri

San Diego, CA 92108-2709

Operating Partners CO LLC

PO Box 194499

San Juan, PR 00919-4499

Rushmore Loan Management servicing Roosevelt
PR 00922

Rushmore Loan Mgmt Ser
15480 Laguna Canyon Rd S

Irvine, CA 92618-2132

Sistema De Retiro

PO Box 42003

San Juan, PR 00940-2203

(p)C O AMERICAN INFOSOURCE LP

4515 N SANTA FE AVE

OKLAHOMA CITY OK 73118-7901

Williams & Rivera Liti

2100 Main St #350

Irvine, CA 92614-6265

CARMEN MARIA NAVARRO FLORES

URB IDAMARIS GARDENS

D-21 MIGUEL A GOMEZ ST

CAGUAS, PR 00727-5720

JOSE RAMON CARRION MORALES
PO BOX 9023884

SAN JUAN, PR 00902-3884

MONSITA LECAROZ ARRIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO

PO BOX 186

CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

T-mobile

12920 Se 38th Stree

Bellevue, WA 98006

End of Label Matrix

Mailable recipients 23

Bypassed recipients 0

Total 23